

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LULA WILLIAMS, <i>et al.</i>,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 3:17-cv-461 (REP)
)	
BIG PICTURE LOANS, LLC, <i>et al.</i>,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ MOTION TO COMPEL INFORMATION WITHHELD
ON THE BASIS OF ATTORNEY-CLIENT PRIVILEGE**

Plaintiffs, by counsel, pursuant to Rule 37 of the Federal Rules of Civil Procedure and the Court’s Order dated January 22, 2019 (Dkt. 320), move for an order compelling production of all documents withheld by Defendant Matt Martorello on the basis of attorney-client privilege and the attorney work product doctrine, as well as any documents subsequently identified by Martorello as part of his renewed search to identify responsive documents.

For the reasons explained in the Memorandum in Support filed contemporaneously herewith, Plaintiffs request the Court to grant this motion and enter an order: (1) compelling the production of all documents withheld on Martorello’s privilege logs, (2) requiring Martorello to disclose all advice (written or oral) received from any attorneys regarding: (i) the legality of the tribal business model, (ii) the legality of the LVD’s lending operations, (iii) the restructure, (iv) any litigation involving any similar business models, including but not limited to any litigation involving CashCall, John Reddam, Scott Tucker, Charles Hallinan, Think Finance, and Kenneth Rees, and (3) finding a waiver of privilege and work product as to: (i) any evidence destroyed as part of the sale of Bellicose Capital to the LVD, including any documents retrieved by Martorello and any attorneys who represented his companies; and (ii) any communications or information

created in the planning of or in furtherance of the spoliation.

Respectfully submitted,
PLAINTIFFS

By: /s/ Kristi C. Kelly
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28th of January, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

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